

Exhibit 18

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THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

KATHY CLARK, AMY ENDSLEY, SUSAN *
GRIMMETT, MARGUERIETTE SCHMOLL, *
AND KEVIN ULRICH, ON BEHALF OF *
THEMSELVES AND ALL OTHERS *
SIMILARLY SITUATED, *

Plaintiffs, *

vs. * Civil Action No.
* 1:12-CV-00174-SS

CENTENE CORPORATION, CENTENE *
COMPANY OF TEXAS, L.C., AND *
SUPERIOR HEALTHPLAN, INC., *

Defendants. *

ORAL DEPOSITION OF
CORPORATE REPRESENTATIVE
ESMERALDA CAZARES-BAIG

OCTOBER 23, 2012

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1 A. San Antonio.

2 Q. That was San Antonio. When did you come to
3 Austin?

4 A. In July of 2010.

5 Q. To hold what position?

6 A. Director of Utilization Management.

7 Q. And is that your position now?

8 A. No.

9 Q. What's your position now?

10 A. Vice President of Utilization Management.

11 Q. When did you get that position?

12 A. This year, January of 2012. Oh, I apologize,
13 I did not. I actually -- I got a different promotion
14 in January of 2012. I became vice president in August
15 2012.

16 Q. So just fairly recently?

17 A. Yes.

18 Q. And do you still consider yourself to be an
19 employee of Centene Texas?

20 A. Yes.

21 Q. Have you ever held yourself out to be an
22 employee of Centene Corporation?

23 A. No.

24 Q. Are you familiar with social networking sites
25 and that sort of thing?

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1 A. Yes.

2 Q. Do you belong to any?

3 A. I -- Facebook I do, a personal Facebook.

4 Q. What about Linkedin?

5 A. I just recently -- somebody signed me up that
6 used to be an H.R. -- he was like interim temp person.

7 Q. And have you ever viewed your profile page?

8 A. No, I have not.

9 Q. Who supplied the information to Linkedin?

10 A. He sent me a link, and then I just accepted
11 it.

12 Q. Okay. Did you look at it?

13 A. Briefly. It was at work, so I -- I mean, I've
14 been getting messages to go in there and update it and
15 put more data into my profile, but I've not done so.

16 Q. Did you supply the data for your profile
17 initially?

18 A. He knew me from the company, so he provided --
19 he had some of it filled out, and I just accepted the
20 Linkedin.

21 Q. Okay. So you reviewed it and clicked okay?

22 A. Yeah.

23 Q. Is this a copy of your profile page?

24 A. It appears to be, yes.

25 Q. And who does that list your employer as?

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1 A. Centene Corporation.

2 Q. You understand the difference between Centene
3 Texas and Centene Corporation. Correct?

4 A. Correct.

5 Q. Let's go ahead and mark that as Plaintiff's 1.
6 (Exhibit No. 1 marked)

7 Q. And who does Exhibit 1 -- what does it list as
8 your job title?

9 A. Senior Director of Utilization Management.

10 Q. And when did you get that job?

11 A. January of 2012.

12 Q. Okay. Who do you answer to?

13 A. Who's my boss?

14 Q. Sure.

15 A. Christine Brzycki.

16 Q. And where is --

17 MR. KAISER: You probably need to spell
18 that.

19 THE WITNESS: B-r-y-z -- sorry.

20 B-r-z-y-c-k-i.

21 Q. And where is Ms. Brzycki located?

22 A. In Austin.

23 Q. And do you know who she answers to?

24 A. Cindy Adams.

25 Q. And where is Cindy Adams located?